

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT of TENNESSEE  
at CHATTANOOGA

UNITED STATES OF AMERICA ) 1:15-cr-39  
 )  
 v. ) Judge Collier  
 ) Magistrate Judge Lee  
 ROBERT R. DOGGART )

**GOVERNMENT'S MOTION TO UNSEAL WIRETAP CONTENTS AND RELATED DOCUMENTS**

The United States of America by and through William C. Killian, United States Attorney for the Eastern District of Tennessee, Perry H. Piper, Assistant United States Attorney, and Saeed A. Mody, Trial Attorney for the U.S. Department of Justice, Civil Rights Division, hereby moves to unseal the Title III wiretap and the related documents in this case. This Court (the Honorable Harry S. Mattice, Jr.) authorized interception of a cellular telephone located in the Eastern District of Tennessee. Interception began on March 15, 2015, and concluded on April 10, 2015.

As grounds for the unsealing, the government would show that an individual in South Carolina had been intercepted during the course of the wiretap. Based in part on the intercepted conversations, this individual was charged with federal offenses in the District of South Carolina. In order to comply with discovery requirements, the Assistant United States Attorney in South Carolina must release the wiretap contents and its accompanying documents. In the Court's order sealing the wiretap and its contents, the Court stated that the contents "shall be disclosed only upon a showing of good cause before a judge of competent jurisdiction." The government submits that the discovery requirements in a related case constitute "good cause."

For the foregoing reasons, the government respectfully requests that the wiretap, including the intercepted calls, and the affidavit, application and order in support of the wiretap be unsealed in order for it to be provided to the defendant in the District of South Carolina.

Respectfully submitted,

WILLIAM C. KILLIAN  
United States Attorney

By: s/ Perry H. Piper  
Perry H. Piper  
Assistant United States Attorney

By: s/ Saeed A. Mody  
Saeed A. Mody  
Trial Attorney  
Civil Rights Division

CERTIFICATE OF SERVICE

I hereby certify that on July 1, 2015, this response was filed electronically, and notice of its filing will be sent by operation of the Court's electronic filing system to all parties indicated on the electronic filing receipt. Any parties not listed as being served by the Court's filing system will be served by regular United States mail, postage prepaid.

s/ Perry H. Piper  
Perry H. Piper  
Assistant United States Attorney